



U.S. Department of Justice

United States Attorney
Southern District of New York

July 19, 2023

VIA ECF

The Honorable John P. Cronan
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Reclaim the Records et al., v. U.S. Dep't of State*, 23-cv-01650 (JPC)

Dear Judge Cronan:

This Office represents the U.S. Department of State (the “DOS”) in the above-referenced action brought under the Freedom of Information Act (“FOIA”). We write jointly with Plaintiffs Reclaim the Records and Alec Ferreti (“Plaintiffs”) to provide the Court with a status update pursuant to the Court’s June 15, 2023 Order. *See* ECF No. 14.

The DOS is still assessing whether, and to what extent, it may be able to process Plaintiffs’ request for “[a]n extract of all information for deceased passport holders maintained in the passport database.” The DOS has agreed to provide Plaintiffs with a further update by July 28, 2023.

Because this is a FOIA case, we anticipate that this matter will either be resolved consensually, or through motions for summary judgment on any issues the parties are unable to resolve. We therefore respectfully request that the parties be required to provide the Court with a written status update on or before August 4, 2023. If the parties agree upon the scope of the requested search, we will negotiate a production schedule and advise the Court of same. If we reach an impasse as to the scope of the requested search, we will propose a briefing schedule for motions for summary judgment.

We thank the Court for its consideration of this letter.

Respectfully,

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The request is granted. The deadline for the parties to submit a status letter as to how they intend to proceed in this case is adjourned to August 4, 2023. The Clerk of Court is respectfully directed to close Docket Number 15.

SO ORDERED.

July 20, 2023
New York, New York


JOHN P. CRONAN
United States District Judge